

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MAISHA EMMANUEL, ON BEHALF OF)
HERSELF AND ALL OTHERS)
SIMILARLY SITUATED,)
PLAINTIFF,) CIVIL ACTION NO. 1:15-CV-12914
v.)
HANDY TECHNOLOGIES, INC.,)
DEFENDANT.)

)

MOTION TO COMPEL ARBITRATION AND DISMISS COMPLAINT

Pursuant to 9 U.S.C. §§ 3, 4 and Rule 12(b)(1), Defendant Handy Technologies, Inc. (“Handy”), by its undersigned counsel, respectfully requests that the Court dismiss Plaintiff’s class claims and order her to submit her individual claims to arbitration. Handy sets forth the grounds for this Motion in its accompanying Memorandum of Law and supporting papers.

Pursuant to Local Rule 7.1, Handy states that its counsel attempted to confer with Plaintiffs’ attorney this date by phone in a good faith effort to resolve or narrow the issues presented, but was unable to reach Plaintiffs’ attorney.

REQUEST FOR ORAL ARGUMENT

Handy respectfully requests oral argument on this Motion.

Respectfully submitted,

HANDY TECHNOLOGIES, INC.

By its attorney,

/s/ Michael Mankes

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August 10, 2015

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of August, 2015, a true and accurate copy of this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and sent via first class mail to unregistered participants.

/s/ Michael Mankes

Michael Mankes